



March 23, 2009
Via ECFS Transmission

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Ms. Marlene H. Dortch, FCC Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

RE: ONS-Telecom, LLC - 2008 CPNI Certification Filing – (Revised)
EB Docket No. 06-36

Dear Ms. Dortch:

Enclosed for filing please find a revised 2008 Annual CPNI Compliance Certification submitted on behalf of ONS-Telecom, LLC. This filing revises the current statement which was originally filed February 27, 2009, and is being resubmitted with the original affidavit.

Any questions you may have concerning this filing may be directed to me at 407-740-3004 or via email to rnorton@tminc.com.

Sincerely,

Robin Norton
Consultant to of ONS-Telecom, LLC

RN/lm

cc: Best Copy and Printing, Inc. - FCC@BCPIWEB.COM
cc: FCC Enforcement Bureau (2 copies)
cc: Linda Smith - ONS
file: ONS - FCC
tms: FCCx0901

Annual 47 C.F.R. § 64.2009(e) CPNI Certification - EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: 2/27/2009

Name of company covered by this certification: CNS-Telecom, LLC

Form 499 Filer ID: 822898

Name of signatory: Linda Smith

Title of signatory: Secretary

I, Linda Smith, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's

CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules [attach accompanying statement].

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data

brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access

CPNI, and what steps companies are taking to protect CPNI.

If affirmative: [Provide explanation of any actions taken against data brokers]

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to

CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint,

e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information,

or instances of improper access to online information by individuals not authorized to view the information).

If affirmative: [Provide summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.]

Signed

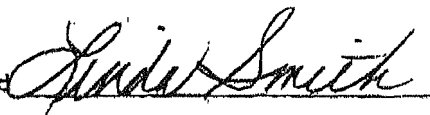


Exhibit A
Statement of CPNI Procedures and Compliance

Statement of CPNI Procedures and Compliance
For 2008
ONS-Telecom, LLC

ONS-Telecom, LLC does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Our marketing efforts do not require the use of any client-specific information. Should we elect to use CPNI in any future marketing efforts, we will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

We have in place specific processes to safeguard our customers' CPNI from improper use or disclosure by its employees and attempts by third parties to gain unauthorized access to CPNI and call detail information. Customers are contacted at the telephone number of record or email address of record to follow up on information or service inquiries. ONS-Telecom has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI.

We do not provide call detail information over the telephone. All customer service personnel are trained not to discuss call detail information unless calling party can identify the call detail related to their inquiry. Customers (inbound callers into our Customer Service Center) are required to give the call detail information to the Customer Service Representatives as well as their names prior to providing any assistance or information. We only disclose the information requested that comes directly from the billed information. The customer must have the call detail/bill when calling and must be the name on the account.

To date, ONS-Telecom has never disclosed any CPNI to a third party, but should this occur, records will be maintained in accordance with FCC rules.

We have instituted authentication procedures to safeguard the disclosure of CPNI on-line which do not require the use of readily available biographical information or account information as defined by the FCC. We authenticate customers by providing a unique system generated user ID and password. Customer on-line access is restricted to one user using the service initiation e-mail address of record for communications purposes. ONS-Telecom has established a back up authentication method for lost or stolen passwords that does not involve readily available biographical information or account information. If a password is lost or forgotten, a system generated new User ID and password is sent electronically to the customer e-mail address of record. Unless the appropriate password is provided, we do not allow on-line access to the client's data.

We have procedures in place to notify customers whenever a password, authentication for lost or forgotten passwords, online account, or address of record is created or changed without revealing the changed information. We do not send the notification to the new account information. A voicemail is left with the phone number of record.

We do not have any retail locations and therefore do not disclose CPNI in-store.

We have not had any attempts by third parties to gain unauthorized access to client information and therefore have no records to date of such breaches. However, we have procedures in place to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

We have not taken any actions against data brokers in the last year.

We have not received any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2008.

We have not developed any information with respect to the processes pretexters may use to attempt to access CPNI.